

**UNITED STATES BANKRUPTCY COURT  
District of Nebraska**

In  
Re:

Seat Scouts LLC  
  
Debtor(s)

Case No. 20-80777-BSK  
Chapter 7

Judge Brian S. Kruse

**SUMMONS TO DEBTOR IN INVOLUNTARY CASE**

To the above named debtor:

A petition under title 11, United States Code was filed against you on June 15, 2020 in this bankruptcy court, requesting an order for relief under chapter 7 of the Bankruptcy Code (title 11 of the United States Code).

YOU ARE SUMMONED and required to file with the clerk of the bankruptcy court a motion or answer to the petition within 21 days after the service of this summons. A copy of the petition is attached.

**Address of the clerk:**

United States Bankruptcy Court  
111 South 18th Plaza, Suite 1125  
Omaha, NE 68102

At the same time, you must also serve a copy of the motion or answer upon the petitioner's attorney.

**Name and address of Petitioner's Attorney:**

Douglas E. Quinn  
McGrath, North, Mullin & Kratz, P.C.  
Suite 3700 First National Tower  
1601 Dodge Street  
Omaha, NE 68102-1637

If you make a motion, your time to answer is governed by Fed. R. Bankr. P. 1011(c).

If you fail to respond to this summons, the order for relief will be entered.



/s/ Diane Zech  
Clerk, U.S. Bankruptcy Court

By: s/Beth Evans  
Deputy Clerk

(Seal of the U.S. Bankruptcy Court)

Date: 6/16/20

**Fill in this information to identify the case:**

United States Bankruptcy Court for the:

\_\_\_\_\_ District of Nebraska  
(State)

Case number (if known): \_\_\_\_\_ Chapter 7

☐ Check if this is an amended filing

**Official Form 205**

**Involuntary Petition Against a Non-Individual**

12/15

Use this form to begin a bankruptcy case against a non-individual you allege to be a debtor subject to an involuntary case. If you want to begin a case against an individual, use the *Involuntary Petition Against an Individual* (Official Form 105). Be as complete and accurate as possible. If more space is needed, attach any additional sheets to this form. On the top of any additional pages, write debtor's name and case number (if known).

**Part 1: Identify the Chapter of the Bankruptcy Code Under Which Petition Is Filed**

**1. Chapter of the Bankruptcy Code**

Check one:

☒ Chapter 7

☐ Chapter 11

**Part 2: Identify the Debtor**

**2. Debtor's name**

Seat Scouts, LLC

**3. Other names you know the debtor has used in the last 8 years**

Include any assumed names, trade names, or doing business as names.

**4. Debtor's federal Employer Identification Number (EIN)**

☐ Unknown

81 - 5247327  
EIN

**5. Debtor's address**

**Principal place of business**

**Mailing address, if different**

7202 Giles Road, Ste. 4 #330  
Number Street

\_\_\_\_\_  
Number Street

LaVista NE 68128  
City State ZIP Code

\_\_\_\_\_  
P.O. Box

\_\_\_\_\_  
City State ZIP Code

**Location of principal assets, if different from principal place of business**

Sarpy  
County

\_\_\_\_\_  
Number Street

\_\_\_\_\_  
City State ZIP Code

Debtor Seat Scouts, LLC  
Name

Case number (if known) \_\_\_\_\_

6. Debtor's website (URL) \_\_\_\_\_

7. Type of debtor  
☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))  
☐ Partnership (excluding LLP)  
☐ Other type of debtor. Specify: \_\_\_\_\_

8. Type of debtor's business  
*Check one:*  
☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))  
☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))  
☐ Railroad (as defined in 11 U.S.C. § 101(44))  
☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))  
☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))  
☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))  
☒ None of the types of business listed.  
☐ Unknown type of business.

9. To the best of your knowledge, are any bankruptcy cases pending by or against any partner or affiliate of this debtor?  
☒ No  
☐ Yes. Debtor \_\_\_\_\_ Relationship \_\_\_\_\_  
District \_\_\_\_\_ Date filed \_\_\_\_\_ Case number, if known \_\_\_\_\_  
MM / DD / YYYY  
Debtor \_\_\_\_\_ Relationship \_\_\_\_\_  
District \_\_\_\_\_ Date filed \_\_\_\_\_ Case number, if known \_\_\_\_\_  
MM / DD / YYYY

**Part 3: Report About the Case**

10. Venue  
*Check one:*  
☒ Over the last 180 days before the filing of this bankruptcy, the debtor had a domicile, principal place of business, or principal assets in this district longer than in any other district.  
☐ A bankruptcy case concerning debtor's affiliates, general partner, or partnership is pending in this district.

11. Allegations  
Each petitioner is eligible to file this petition under 11 U.S.C. § 303(b).  
The debtor may be the subject of an involuntary case under 11 U.S.C. § 303(a).  
*At least one box must be checked:*  
☒ The debtor is generally not paying its debts as they become due, unless they are the subject of a bona fide dispute as to liability or amount.  
☐ Within 120 days before the filing of this petition, a custodian, other than a trustee, receiver, or an agent appointed or authorized to take charge of less than substantially all of the property of the debtor for the purpose of enforcing a lien against such property, was appointed or took possession.

12. Has there been a transfer of any claim against the debtor by or to any petitioner?  
☒ No  
☐ Yes. Attach all documents that evidence the transfer and any statements required under Bankruptcy Rule 1003(a).

Debtor Seat Scouts, LLC  
Name

Case number (if known) \_\_\_\_\_

13. Each petitioner's claim	Name of petitioner	Nature of petitioner's claim	Amount of the claim above the value of any lien
	<u>Broker Genius, Inc.</u>	<u>Judgment</u>	<u>\$ 1,780,039.03</u> plus interest
	<u>366 5th Ave, 4th Floor</u>	_____	\$ _____
	<u>New York, NY 10001</u>	_____	\$ _____
	Total of petitioners' claims		<u>\$ 1,780,039.03</u> plus interest

If more space is needed to list petitioners, attach additional sheets. Write the alleged debtor's name and the case number, if known, at the top of each sheet. Following the format of this form, set out the information required in Parts 3 and 4 of the form for each additional petitioning creditor, the petitioner's claim, the petitioner's representative, and the petitioner's attorney. Include the statement under penalty of perjury set out in Part 4 of the form, followed by each additional petitioner's (or representative's) signature, along with the signature of the petitioner's attorney.

#### Part 4: Request for Relief

**WARNING** — Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Petitioners request that an order for relief be entered against the debtor under the chapter of 11 U.S.C. specified in this petition. If a petitioning creditor is a corporation, attach the corporate ownership statement required by Bankruptcy Rule 1010(b). If any petitioner is a foreign representative appointed in a foreign proceeding, attach a certified copy of the order of the court granting recognition.

I have examined the information in this document and have a reasonable belief that the information is true and correct.

#### Petitioners or Petitioners' Representative

#### Attorneys

#### Name and mailing address of petitioner

Broker Genius, Inc.  
Name  
366 5th Ave., 4th Floor  
Number Street  
New York NY 10001  
City State ZIP Code

Douglas E. Quinn  
Printed name  
McGrath North Mullin & Kratz, PC LLO  
Firm name, if any  
1601 Dodge Street, Ste. 3700  
Number Street  
Omaha NE 68102  
City State ZIP Code

#### Name and mailing address of petitioner's representative, if any

Sam Sherman  
Name  
366 5th Ave., 4th Floor  
Number Street  
New York NY 10001  
City State ZIP Code

Contact phone 402-340-3070 Email dquinn@mcgrathnorth.com  
Bar number 15742  
State Nebraska

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 06/15/2020  
MM / DD / YYYY

☒ [Signature] CEO  
Signature of petitioner or representative, including representative's title

☒ /s/ Douglas E. Quinn

Signature of attorney

Date signed 06/15/2020  
MM / DD / YYYY

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEBRASKA**

IN RE: ) CASE NO. \_\_\_\_\_  
)  
SEAT SCOUTS, LLC, ) CHAPTER 7  
)  
Debtor. )  
)

**PETITIONING CREDITOR BROKER GENIUS, INC.'S DISCLOSURE OF  
CORPORATE AFFILIATIONS, FINANCIAL INTEREST, AND BUSINESS ENTITY  
CITIZENSHIP**

Pursuant to Federal Rule of Civil Procedure 7.1 and *GMAC Commercial Credit LLC v. Dillard Department Stores, Inc.*, 357 F.3d 827, 828 (8th Cir. 2004), Broker Genius, Inc., makes the following disclosures concerning parent companies, subsidiaries, partners, limited liability entity members and managers, affiliates, and similar entities, as well as unincorporated associations or similar entities.

*[INSTRUCTIONS: Check the applicable box or boxes, and fill in any required information.]*

☐ This party is an individual.

☐ This party is a publicly held corporation or other publicly held entity.

☒ This party has parent corporations.

If yes, identify all parent corporations, including grandparent and great-grandparent corporations:

Volition Capital Fund III, L.P.

☐ Ten percent or more of the stock of a party is owned by a publicly held corporation or other publicly held entity.

If yes, identify all such owners:

☐ Another publicly held corporation or another publicly held entity has a direct financial interest in the outcome of the litigation.

If yes, identify all corporations or entities and the nature of their interest:

☐ This party is a limited liability company or limited liability partnership.

If yes, identify each member of the entity and the member's state of citizenship:

☐ This party is an unincorporated association or entity.

If yes, identify the members of the entity and their states of citizenship:

Dated this 15<sup>th</sup> day of June, 2020.

**BROKER GENIUS, INC., Petitioning  
Creditor,**

/s/ Douglas E. Quinn  
Douglas E. Quinn, #15742  
McGrath North Mullin & Kratz, PC LLO  
First National Tower, Suite 3700  
1601 Dodge Street  
Omaha, Nebraska 68102  
Phone: (402) 341-3070  
Fax: (402) 952-6896  
dquinn@mcgrathnorth.com

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was served upon all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system on the 15<sup>th</sup> day of June 2020.

s/Douglas E. Quinn